Before the Federal Communications Commission

Washington DC 20554

In the Matter of	)	
Modernizing the E-Rate Program for Schools and Libraries	)	WC Docket No. 13-184
	)	
Notice of Proposed Rulemaking	)	
	)	

Comments of the National Association of Elementary School Principals

I.   Introduction

The National Association of Elementary School Principals (NAESP), founded in 1921, is pleased to provide comments on the Commission's most recent Notice of Proposed Rulemaking (Notice)[1]. NAESP is a professional association representing over 20,000 of the nation's elementary and middle-level principals who serve approximately 33 million children in prekindergarten through the eighth grade (pre-K-8). The association develops dynamic leaders, efficient systems and creative resources that build the capacity of principals for long-term sustainability and adaptability in a rapidly changing world. With research-based practices, effective tools, shared learning experiences and networking, principals can better understand and prepare students for high-quality learning experiences. Principals nationwide have expressed strong support for the E-Rate program and its success providing greater access to technology and capability of schools to meet demands for digital learning in general over the past decade. As Karen Peterson, Principal of Illini Bluffs Middle School remarked, "We would not have been able to upgrade data and internal connections without the E-Rate Services." However, the nation's principals are concerned about the ability of the E-Rate program to keep pace with the demands of schools in high-capacity broadband technology as educators work to prepare students for a 21st Century global workforce. Transformation and improvement of schools requires access to appropriate technology infrastructure, and many principals are struggling to provide upgrades that will meet the expectations of a digitally-rich student learning environment,

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[1] *Modernizing the E-Rate Program for Schools and Libraries*, WC Docket 13-84, Notice of Proposed Rulemaking (2013) (*Notice).*

particularly in rural schools. To achieve this goal, schools must have access to technology, as well as the ability to sustain upgrades. Now more than ever, accelerating the deployment of advanced telecommunications and information services in schools and libraries is imperative. This obligation is glaring as an overwhelming number of schools in the U.S. are unable to support the migration of paper and pencil student assessments to online delivery. Without additional access to the technology and capacity that is needed to support robust digital learning, the vision for the future of education using technology will never be realized. According to an NAESP member in Michigan, *"E-rate will help us to continue adapting and moving forward in the future."* But without significant expansion, the past ten years of technology advances proves that E-Rate is essential for the future success of students in a world that many adults can barely imagine.

In addition, elementary and middle level principals value the E-Rate program as a means to ensure equity and access to educational opportunities. Whether in an urban or rural setting, all students should be afforded equal access to digital learning through streamed video, online courseware, virtual field trips, consistent data usage, as well as safe and reliable connections to appropriate Internet research. As instructional leaders, principals work to help every student reach their greatest potential. According to many NAESP members, E-Rate has been "game-changing" for many schools, especially those in rural and remote locations. Connectivity has helped schools that serve disadvantaged students access tools to become better learners, and improved the effectiveness and productivity of teachers. Principals are the chief "learning engineers" in schools and, as instructional leaders, know that technology has changed the complexion of schools and classrooms. Their leadership depends on the ability to equip schools when needed, and steward the use of technology to solve learning challenges. Principals are becoming masters of navigating programs, gadgets, and curricula to best utilize resources. Applying the principles of learning science to these leadership competencies has deepened the level of thinking about technology, and led to more meaningful student outcomes. Whether it is whole-school reform or targeted interventions, technology and connectivity have motivated principals to rethink or "re-engineer" the use of technology to optimize teaching and learning. Without E-Rate, this new paradigm would not be possible.

Finally, NAESP is a supportive member of the Education and Libraries Networks Coalition (EdLiNC), and works to uphold the coalition's mission to promote and improve E-Rate. NAESP fully endorses the formal comments submitted by EdLiNC, and seeks to underscore the following issues consistent with coalition's submission:

1) The E-Rate program has been successful and must be sustained;
2) Current funding is inadequate to meet current and future demand in schools; and
3) The application process must be streamlined, and program efficiency must be improved.

1. Principals Believe E-Rate is Successful and Critical for School Success.

Public schools in the U.S. today educate more than 33 million children, with more than 56,000 schools serving Title I-eligible students. The E-Rate program has provided support for nearly every classroom that has basic internet connectivity. Nationwide, the program is fulfilling its mission and serves as a catalyst for online and digital education. Students are developing critical learning and technical skills, and working towards becoming part of a competitive global

workforce. Since its inception, the E-Rate program has worked with great success to ensure that students and educators are connected to the Internet and have access to online communications – schools today cannot function in isolation of this technology. By all accounts, elementary and middle level principals applaud the success of E-Rate, which has helped make schools hubs in the digital age. In its current form, the program allows schools to tailor applications to best meet the learning needs of the school community, and choose services and technologies appropriate for the building. This is a critical function of E-Rate as schools have various contexts with unique challenges and technology needs.

2. **NAESP Believes that the E-Rate's Funding is Inadequate to Meet Current and Future Demand and Urges an Increase to at least $5 Billion Annually**

Consistent with EdLiNC's submission, paragraphs 172–176 of the Notice raise the issue of E-Rate funding and ask whether the Commission should look to reprioritize current funds, authorize a temporary increase to the E-Rate cap, or authorize a permanent cap raise.[2]

NAESP submits that although the E-Rate program has been incredibly successful, it must be expanded to keep pace with demand now and in the future. The basic connectivity that E-Rate helped establish within America's schools is no longer enough to support the need for high-capacity broadband.

Brian Pickard, Principal of South Colby Elementary in Port Orchard, WA, leads a school that was built in 1957 and is one of the oldest in the district. While the teachers have one computer per classroom, there is no electrical capacity or network infrastructure to expand beyond what the school currently has. He notes that his district, South Kitsap School District, benefits from the E-rate program by receiving approximately 50% reimbursement for our Priority 1 wide area network, telecommunications, cellular phone and web hosting services. However, 3 of our 10 elementary schools were waiting for wireless networking and other infrastructure upgrades to further student learning, but were being told to wait because there *might* be 80% reimbursement available. Even years later, those schools have gone without much needed upgrades because there simply are no local funds."

The evolution of technology must be brought to every school in need, so that new online tools and services, digital libraries, online assessments and digital textbooks are a reality for all students. For NAESP, it is apparent that the current program cap is insufficient to meet current applicant demand, which has been more than double available funding in the past two years. Based on numerous polls and projections, that actual demand is repressed because most applicants no longer bother to apply for the dwindling Priority 2 support now available. This points to the amount of both current and future demand that will continue to be unmet unless the program funding is increased.

At a minimum, NAESP believes that an increase should at least meet current application demand levels, which total $5 billion over the past two years. We also believe that any increase in the current cap should be made permanent, providing applicants certainty that appropriate levels of funding will be available to them for the program's next 15 years. Without an increase in the

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[2] *Notice* at paras. 172–176.

program's annual cap, NAESP believes that the program's ability to support existing and new services will not be sustainable.

a. E-Rate's Mission is Neither Antiquated Nor Complete

The E-Rate program continues to enjoy a viable mission. Students embrace digital learning, which must be fueled by greater access to bandwidth. Project Tomorrow's Speak Up 2012 online nationwide survey of more than 364,000 students shows that America's students now expect to utilize technology in all aspects of their educational experience: 69% of middle school students want to use devices to take notes in class, 64% wish to access online textbooks, 73% want the ability to look up information on the Internet whenever they have the need, and 69% would like to record lectures or labs so that they can review the information at a later time.[3] The Project Tomorrow surveys also demonstrate that students value online learning.

The increasing interest by students and educators in digital learning is driving efforts to greatly expand technology access in schools and libraries, which leads to the need for more bandwidth. School districts continue to pick up the pace in implementing 1:1 (1 student: 1 computer) initiatives and establishing Bring Your Own Device (BYOD) programs that allow students to use their own devices at school. According to Project Tomorrow, districts are increasingly looking to adopt Bring-Your-Own-Device (BYOD) programs as the number of surveyed districts with BYOD pilots increased 47% between 2011 and 2012.[4] School districts and textbook publishers are also beginning the transition from print to digital. According to a study of this topic made by the State Educational Technology Directors Association, "One current estimate puts digital textbooks at about three percent of the education textbook market in 2011. Use of digital content is expected to grow at a year-over-year rate of more than 100 percent, but even then, according to Next is Now, the blog for a textbook distribution company, schools will have just 19.5 percent adoption by 2014 and 50 percent by 2018."[5] Finally, many states are now using bandwidth intensive online assessments, some of which are adaptive. This poses challenges for schools that have yet to operate at full capacity and will jeopardize their ability to meet expectations for assessment delivery. E-Rate is needed now and in the future to help students and schools reach the full potential that online and connected education offers.

b. E-Rate's Funding is Inadequate to Meet Current and Future Demand

Consistent with EdLiNC's submission, paragraph 9 of the Notice suggests that E-Rate cannot support what schools and libraries need to do right now, let alone in the coming years.

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[3] Project Tomorrow Speak Up, From Chalkboards to Tablets: The Emergence of the K-12 Digital Learner, at 10 (rel. June 2013), *available at* http://www.tomorrow.org/speakup/pdfs/SU12-Students.pdf (last visited Sept. 12, 2013) (Speak Up 2012 National Findings K-12 Students).
[4] Project Tomorrow Speak Up, From Chalkboards to Tablets: The Digital Conversion of the K-12 Classroom, at 3 (rel. Apr. 2013), *available at* http://www.tomorrow.org/speakup/pdfs/SU12EducatorsandParents.pdf (last visited Sept. 12, 2013) (Speak Up 2012 National Findings Educators and Parents).
[5]Fletcher, G., Schaffhauser, D, & Levin, D. (2012). Out of Print: Reimagining the K-12

According to an NAESP principal from Illinois, **"*As we begin integrating more and more technology we have to consider the system's ability to support it…and while our broadband and Wi-Fi is meeting the current needs, however as we integrate more technology our needs will not be met.*"**

The E-Rate funding cap was set by the Commission when it created the E-Rate program in 1997 and demand for funds has exceeded the cap every year since the inception of the program. In addition:

- Priority 1 demand has grown consistently so that this year, for the first time ever, Priority 1 demand will eclipse the annual cap itself, leaving no money left for Priority 2.
- An EdLiNC analysis of program demand estimates actual demand for 2013 at greater than $8.6 billion.
- According to EdLiNC's analysis of E-Rate demand, and a cross-section of the nation's 65,000 elementary and middle level principals, the need for E-Rate support will only climb over the next several years.

NAESP offers the following rationale:

- Without an increase in the program's annual cap, the gap between what the program can provide and what schools need will rapidly increase.
- Without an increase in funding, low income, rural and remote schools that are most in need will continue to find themselves in a technology deficit.
- Without an increase in funding, efforts to advance the vision for digital learning will not be realized.

c. E-Rate's funding level must increase to $5 billion to meet demand

Several projections suggest that demand will grow beyond current application demand of $5 billion and that actual demand is already in excess of $8 billion. Since application demand has been at or above $5 billion for the past two years and is likely to continue at or above those levels for the next few years, we urge the Commission to establish $5 billion as the new and permanent annual spending cap.

While some may argue that E-Rate does not need any additional funding or that a temporary increase would be sufficient, NAESP strongly believes that E-Rate needs a permanent and sustained increase, not a short term, one time increase.

Finally, NAESP believes that the current spending cap fails to meet the program's statutory goal of "enhanc(ing), to the extent technically feasible and economically reasonable, access to advanced telecommunications and information services for all . . . elementary and secondary school classrooms."[6]

NAESP strongly urges the Commission to permanently increase the E-Rate cap to $5 billion, which may meet current demand. By permanently increasing the cap to $5 billion, the Commission would provide schools and libraries with sufficient funds to meet the growing needs

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[6] 47 U.S.C. § 254(h)(2)(A).

of Priority1 services *and* allow the program to also fund Priority 2 services to institutions at lower discount levels.

3. NAESP Supports Streamlining the Application Process and Making the Program More Efficient

Based on feedback from elementary and middle level educators, NAESP believes that the program application process must be streamlined and improved.

a. Improving Online Applications

NAESP believes that the online filing process must be improved to be more user-friendly. As one principal noted, "The application process is extremely convoluted and cumbersome. We understand the needs for checks and balances but …instructions for the forms are confusing and almost non-existent. When filing out the forms applicants often fill them out incorrectly and have no information as to what should be changed. This results in the application process stopping and a call must be made to one of the Call Centers, which are usually so overwhelmed it takes several days to get back to the application process."

NAESP also notes a comprehensive list of concerns:

- The online forms often do not work correctly;
- The online forms do not work intuitively (requiring, for example, tab-based navigation rather than mouse-based navigation in order to avoid certain errors);
- The online forms often do not allow the use of the most recent (and widespread) versions of various browsers and officially do not support some of the most common browsers available today. Even in the browser which is officially supported – Microsoft's Internet Explorer – the most recent versions of the browser are not supported. These incompatibilities (which are encountered by and overcome by other online entities) cause problems not only with trying to navigate the forms but also with printing errors, etc.; and
- The online forms often require the re-entry of data multiple times, and fail to give the option of pre-populating the forms with data.

b. Eliminating Paperwork

Also consistent with coalition submission, NAESP supports the position that eligible applicants should be allowed to choose direct reimbursement through the Billed Entity Applicant Reimbursement (BEAR) form process.

Finally, NAESP supports the Commission's proposal to develop a multi-year application process. Having a multi-year application would reduce the burden on applicants, who have repeatedly stated the process for applying to E-Rate is overly cumbersome.

Thank you for your consideration of the comments submitted herein.